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**MAY - 3 1996**

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**EX PARTE**

**May 3, 1996**

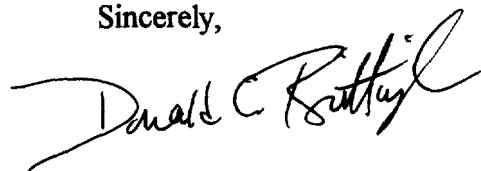
**Mr. William F. Caton**  
**Acting Secretary**  
**Federal Communications Commission**  
**1919 M Street, NW**  
**Washington, DC 20554**

**Re: CC Docket 95-116 -- "Telephone Number Portability"**

Today, Marie Breslin, Jo Gallagher, Doug Jones (all of Bell Atlantic) and I met with David Wye and Nancy Boocker of the Wireless Telecommunications Bureau, Susan McMaster, Melinda Littell, and Jeannie Su of the Common Carrier Bureau, and Greg Rosston and Elliott Maxwell of the Office of Plans and Policy to discuss the Commission's proceeding on Number Portability. We discussed general issues related to the deployment of number portability by local exchange carriers, and specific issues affecting the applicability of number portability to the wireless industry. Materials distributed at the meeting are attached.

Please include this correspondence as part of the public record in the above captioned proceeding. You may direct any questions regarding this matter to me on (202) 392-1189 or to Marie Breslin on (202) 392-6990.

Sincerely,

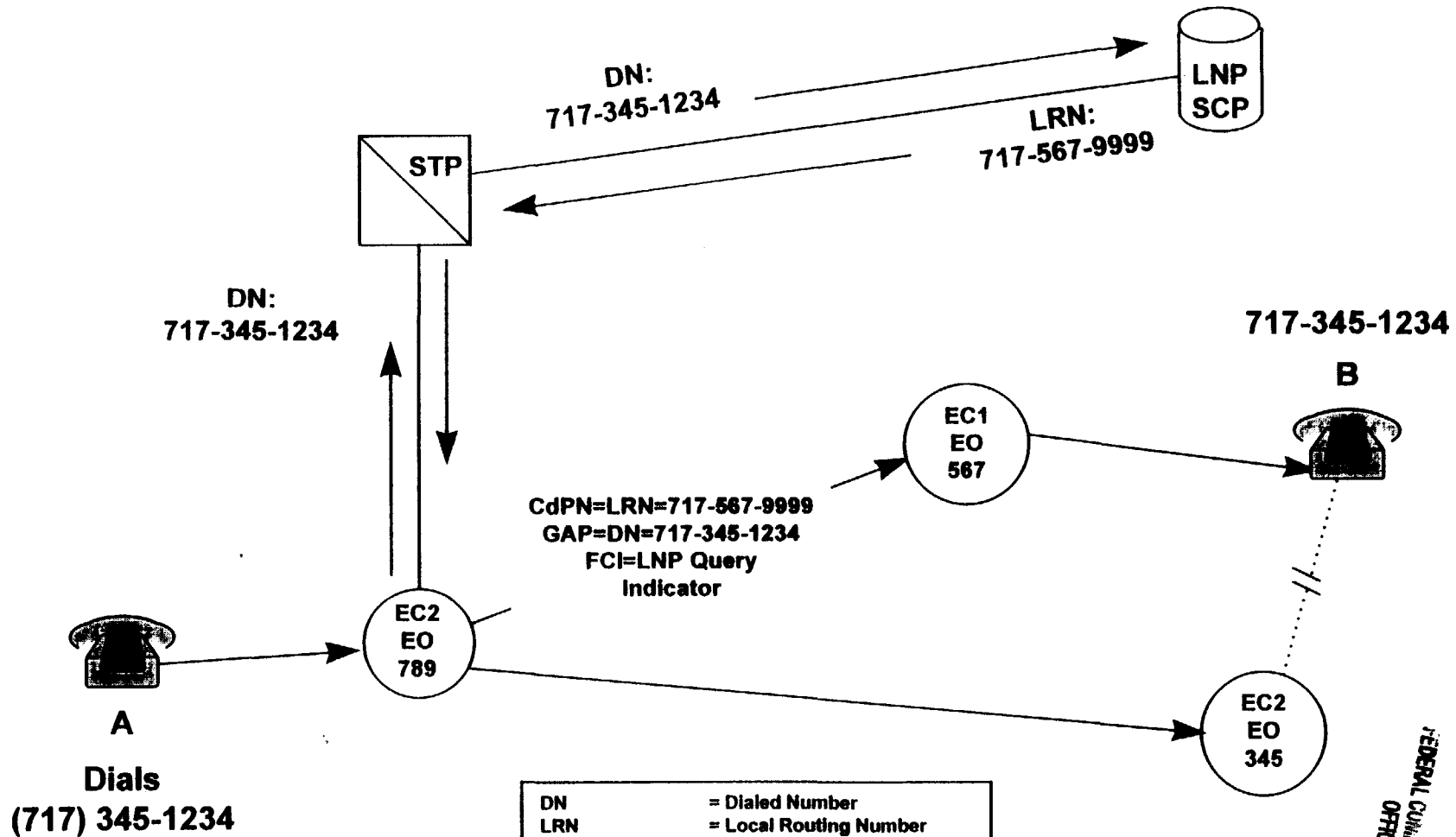


**Attachments**

cc: **N. Boocker**  
**M. Littell**  
**E. Maxwell**  
**S. McMaster**  
**G. Rosston**  
**J. Su**  
**D. Wye**

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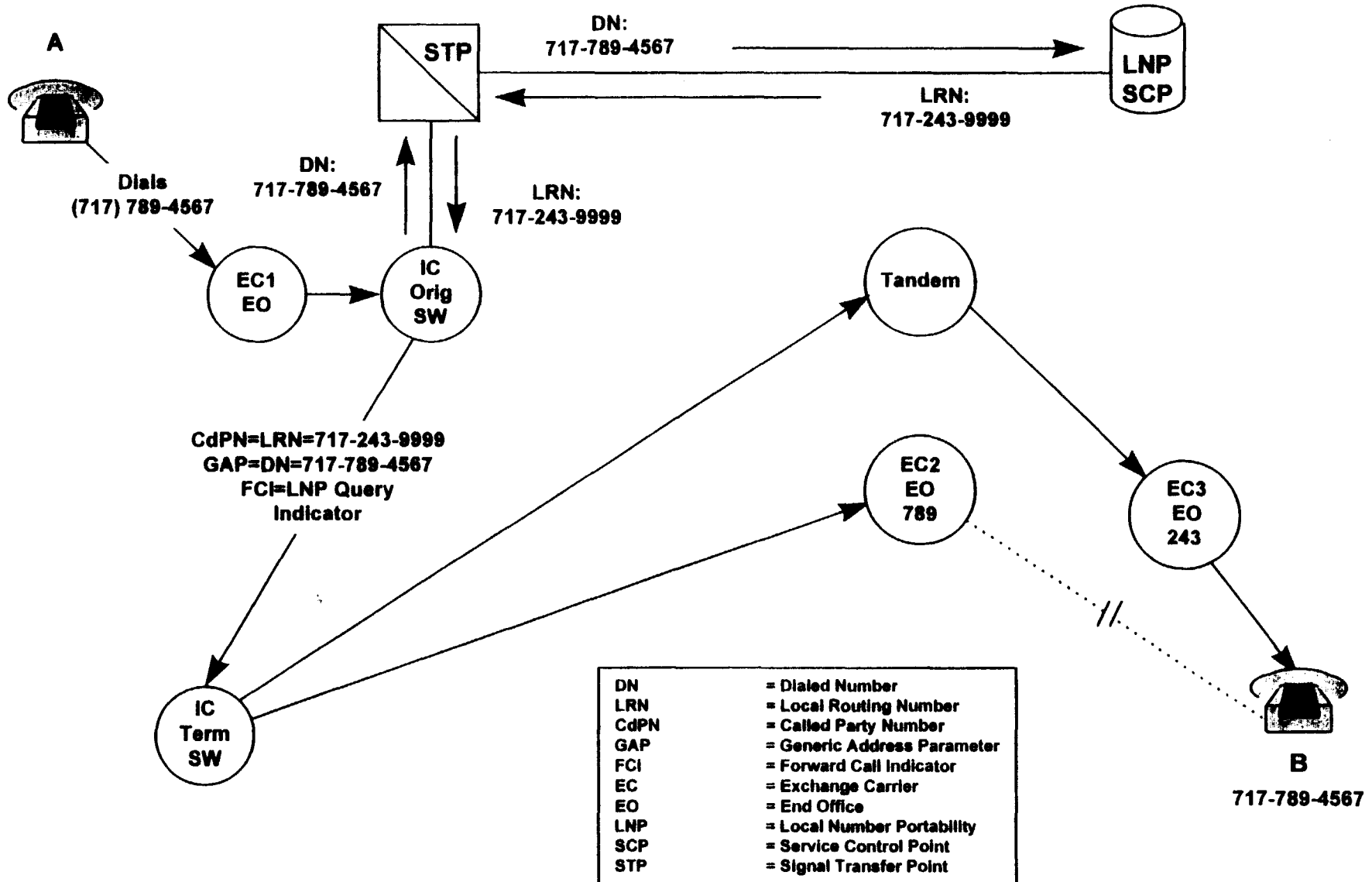
# LRN -- ORIGINATING QUERY



DN	= Dialed Number
LRN	= Local Routing Number
CdPN	= Called Party Number
GAP	= Generic Address Parameter
FCI	= Forward Call Indicator
EC	= Exchange Carrier
EO	= End Office
LNP	= Local Number Portability
SCP	= Service Control Point
STP	= Signal Transfer Point

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# LRN INTERMEDIATE NETWORK QUERY



## **BELL ATLANTIC POSITION**

Expeditious direction needed from FCC on uniform, national long-term number portability solution

- Do not want inconsistent, possibly incompatible, state-specific arrangements

Support LRN as a concept

- LRN is a routing algorithm; it is not a complete number portability solution
- Major technical and operational impacts still unknown

FCC should ensure comprehensive cost-effective long-term national solution

- Mandate national task force to fully define number portability requirements
- Set time line and check points for resolving issues
- Stop further state-specific activities so that industry resources can focus on national solution

1996 Telecom Act recognizes interim solutions as sufficient to promote competition

## LRN ISSUES

No method for eliminating unnecessary queries on interswitch calls to non-ported numbers

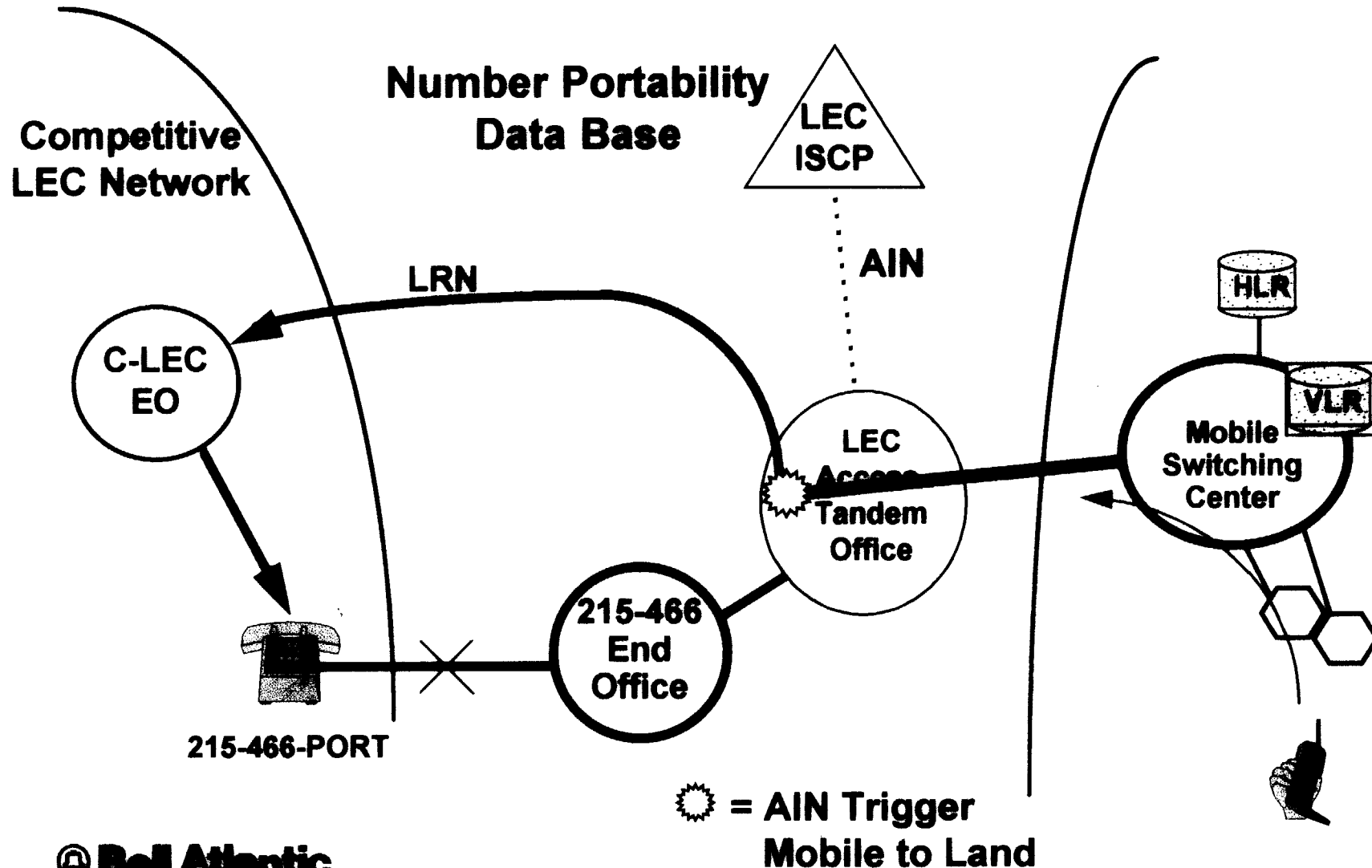
- Billions of unnecessary queries put unneeded load on SS7 network and require additional data links and databases
- Switch vendors unable to provide reliable estimates of impacts on switch processor capacity

Illinois LRN technical requirements constrained by arbitrary 2Q97 implementation date

- To meet 2Q97 date, switch vendors developing different database query mechanisms
  - o Causes added database development costs
  - o Complicates interoperability for smaller carriers not wishing to implement own databases
  - o Constrains ability to support location portability
  - o Unduly complicates maintenance and administration procedures
- Alternately billed calls would require two redundant database queries
  - o Increases cost and adds unnecessarily to call set up time

# Local Number Portability

Access Service - Mobile to Land (Ported Number)



# Traditional Cellular Model

Land to Mobile - Subscriber Roaming

